

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,**  
Plaintiff,

v.

**[1] Sandra ALEMAN-DeJESUS,**  
Defendant.

Criminal No. 97-048 (SEC)

**UNITED STATES OF AMERICA’S RESPONSE IN OPPOSITION TO DEFENDANT’S  
MOTION REQUESTING EARLY TERMINATION OF SUPERVISED RELEASE**

TO THE HONORABLE COURT:

COMES NOW the United States of America, by and through the undersigned attorneys, and very respectfully states and prays as follows:

1. On December 12, 2006, defendant filed a Motion Requesting Early Termination. (Document 403). The defendant is requesting early termination of her five year supervisory release term after having completed two and one-half years.

2. On January 11, 2007, the Court granted the United States until January 27, 2007 to express the Government’s position. (Docket Entry 409).

3. Once a defendant has served at least one year of supervised release, the Court may terminate the remainder of the supervised release term and discharge the defendant “if it is satisfied that such action is warranted by the conduct of the defendant released *and* the interest of justice.” Title 18, United States Code, Section 3583(e)(1). (Emphasis added). It making its determination, the Court must consider the factors set forth in Title 18, United States Code, Section 3553, specifically (a)(1), (a)(2)(B), (a)(2)(C), (a)(2)(D), (a)(4), (a)(5), (a)(6), and (a)(7). Id.

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4. The defendant has failed to articulate any grounds warranting early termination, has failed to provide the court with any information regarding the conduct of the defendant while on supervised release, has failed to address how early termination of supervised release is within the interests of justice, and has failed to analyze the factors set forth in Section 3553 to assist the Court in making its determination.

**WHEREFORE**, the United States respectfully requests the Court **DENY** defendant's motion in its entirety.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 16<sup>th</sup> day of January, 2007.

**ROSA EMILIA RODRÍGUEZ-VÉLEZ**  
United States Attorney

s/Scott Anderson  
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**Certificate of Service**

I HEREBY CERTIFY that on this 16<sup>th</sup> day of January, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to all parties. However, the United States does not possession any contact information for the defendant in order to provide her a copy of this response.

s/Scott Anderson  
Assistant United States Attorney